BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking on the Commission's Own Motion to Assess and Revise the Regulation of Telecommunications Utilities.	Rulemaking 05-04-005 (filed April 7, 2005)
Rulemaking for the Purposes of Revising General Order 96-A Regarding Informal Filings at the Commission.	Rulemaking 98-07-038 (filed July 23, 1998)

PACIFIC BELL TELEPHONE COMPANY D/B/A AT&T CALIFORNIA'S (U 1001 C) REPLY COMMENTS ON DRAFT OPINION ADOPTING TELECOMMUNICATIONS INDUSTRY RULES

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August 20, 2007

Pursuant to Article 14 of the Commission's Rules of Practice and Procedure, Pacific Bell Telephone Company, dba AT&T California ("AT&T California") submits these Reply Comments on Draft Opinion Adopting Telecommunications Industry Rules, issued on July 23, 2007.

I. INTRODUCTION

The Commission has designed streamlined advice letter and information-only filing processes that comport with the regulatory framework created in Decision 06-08-030. Proposals that attempt to reverse URF's regulatory direction should be rejected. Today's competitive marketplace should not be burdened with onerous requirements and rules that are intended to micromanage carrier operations.

II. LEGAL ARGUMENT

A. TURN's Proposal for Stricter Notification Requirements Does Not Provide Additional Safeguards to Consumers, and Is Inconsistent with URF Policies.

1. Requiring the Distribution of Notices to the Service List Is Unnecessary.

TURN's proposal to require the distribution of customer notices to the advice letter service list at the time notices are distributed to customers[1] is not justified. TURN does not need to receive bill inserts at the time they are sent to customers to monitor the marketplace for purposes of filing protests. The timeframe for filing protests has not changed. TURN has the same 20 days to file a protest to an URF carrier's advice letter that were allowed by G.O.96-A for filings made under the pre-URF regulatory regime. Moreover, the burden on carriers of providing service twice for each advice letter filed, including those on the service list who have no interest in the customer notice, is not commensurate with the benefit that TURN claims will result from such a requirement. There are other ways for consumer groups to "ensure fair treatment" of consumers, such as providing educational information to customers about reading their bills.

[1] TURN Comments, pp. 2-3.

2. Imposing Limitations on the Format of Notices Conflicts with Decision 06-03-013.

In Decision 06-03-013, the Commission expressed its aversion towards billing format requirements. It refused to impose a font requirement on grounds that it could trigger significant costs that may be passed on to customers, reduce the number of competitors as a result of cost increases, and induce confusion.[2] The costs on carriers and their customers would far outweigh the benefits of a format requirement for notices.[3]

TURN's proposal to incorporate formatting requirements[4] contradicts the Commission's findings and ruling in Decision 06-03-013 and fails to provide any factual or legal grounds upon which the Commission should deviate from that decision. Anecdotal assertions that notices are buried under multi-page bills and difficult to discern was not sufficient for the Commission to impose format requirements in Decision 06-03-013,[5] and should not be sufficient here.

3. TURN's Expansion of the Definition of "Affected Customers" Should be Rejected.

TURN's definition of "affected customer" is overly broad and would impose unreasonable costs on carriers with little (if any) additional benefit to customers. TURN attempts to secure a rule that would, in essence, require carriers to notice their entire base of customers whenever modifying any price or term. Specifically, TURN suggests that notification be made to that customer if he "has the option or possibility of paying for a certain service or paying a certain fee."[6] Use of the term "option" or "possibility" would necessarily require notice to every single customer because the customer could "possibly" incur the charge should he decide to subscribe to the particular service being noticed in the future.

TURN's rule would result in the distribution of notices to customers who have absolutely

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[2] *Re Establishment of Consumer Rights and Protection Rules*, Decision No. 06-03-013, *Decision Issuing Revised General Order 168, Market Rules to Empower Telecommunications Consumers and to Prevent Fraud*, 2006 WL 768716 (Cal. P.U.C. Mar. 2, 2006), *mimeo*, p. 35.
[3] *Id.*
[4] TURN Comments, pp. 3-4.
[5] D.06-03-013, *mimeo*, pp. 32-33.
[6] TURN Comments, p. 5.

no interest in the information, and would more likely than not create significant confusion. Reading about a price increase to a service that a customer does not subscribe to, for example, could lead the customer to erroneously believe that he is being effected by this pricing modification.

The term "affected customer" is sufficiently clear. As Rule 3 is currently drafted, all customers who do not have an opportunity to avoid a charge or change in a term and condition for a service to which they currently subscribe will be given notice because they are being "affected." Customers who do not currently subscribe to a service and do not receive the notice will be informed of all charges, terms and conditions when they subscribe to the service and will have the opportunity to decide at that time if they wish to incur the associated charges.[7]

B. Requiring Carriers to Demonstrate Compliance with the Criteria in Rule 8.3 Is Unnecessary and Infeasible.

Rule 8.3 requires carriers to attest that all new tariffed services comply with applicable Public Utilities Code provisions, do not degrade the quality of other services, and would not be activated for a customer unless affirmatively requested. TURN's proposal to require carriers to demonstrate, rather than attest, that all new tariffed services comply with Rule 8.3 is infeasible. As the Proposed Decision notes, "demonstrate" suggests an evidentiary process that does not comport with the advice letter process. TURN's opposition to the Proposed Decision's revision of Rule 8.3 belies TURN's assumption that carriers are likely to engage in such risky behavior and introduce new services that are not compliant with applicable rules. TURN has provided no legal or factual grounds upon which to alter the Proposed Decision.

[7] TURN's assertion that AT&T's practice of providing customer notice has been erratic is erroneous. AT&T has distributed notices of price changes to all affected customers who could be identified, including Advice Letters 29682 and 29770 that TURN references in its comments. In fact, AT&T California provided notice to all residential and business customers of the pay-per-use feature price changes recognizing that access line subscribers are affected by this change because they can use a pay per user feature at any time.

C. Cox's Proposed Language Appending Rule 5 Is Erroneous.

Cox's[8] recommendation to modify Rule 5 to define services not granted full pricing flexibility in Decision 06-08-030 as "including but not limited to all presently tariffed services purchased by CLCs or IXCs from ILECs,"[9] is flawed, and should be rejected. As discussed in AT&T California's Reply Comments on the Proposed Detariffing Decision,[10] the reference to undefined services purchased by CLCs or IXCs from ILECs under tariff is not only unnecessary, it is incorrect. For example, other carriers currently purchase retail services from AT&T California's retail tariff. These retail services were granted full pricing flexibility in Decision 06-08-030, and the Detariffing Proposed Decision[11] expressly permits AT&T California to detariff them. Cox's proposed amendment would limit URF carriers' ability to detariff contrary to Decision 06-08-030 and the Detariffing Proposed Decision.

D. The 15-Business Day Filing Requirement In Rule 8.2.1 For Contracts Involving Tariffed Services Should Be Extended to 30 Days.

AT&T California supports Cox's proposal to extend Rule 8.2.1's 15-business day filing requirement to 30 days. The burden that AT&T California has experienced on its administrative processes suggests that a 30 day timeframe would be more reasonable. Providing carriers 30 days to file contracts does not impose any burden on customers since contracts are effective when both parties have signed.

[8] Cox's comments include other carriers, but are hereinafter referred to collectively as Cox.
[9] Cox Comments, p. 3.
[10] *See* AT&T California's Reply Comments on Proposed Detariffing Decision, pp. 2-3 (Aug. 20, 2007).
[11] Proposed Detariffing Decision, p. 73 (Ordering Paragraph 3).

III. CONCLUSION

AT&T California urges the Commission reject all proposed modifications that do not comport with URF policies and the current competitive marketplace.

Dated at San Francisco, California, this 20th day of August 2007.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of **PACIFIC BELL TELEPHONE COMPANY D/B/A AT&T CALIFORNIA'S (U 1001 C) REPLY COMMENTS ON DRAFT OPINION ADOPTING TELECOMMUNICATIONS INDUSTRY RULES**, filed today in **R.05-04-005**/**R.98-07-038** by electronic mail, U.S. Mail, and/or by hand-delivery to the persons on the attached consolidated Service List in **R.05-04-005**.

Executed this 20th day of August 2007, at San Francisco, California.

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Service Lists

Proceeding: R0504005 - CPUC - PAC BELL, VER
Filer: CPUC - FRONTIER COMMUNICATIONS OF CALIFORNIA
List Name: INITIAL LIST
Last changed: August 17, 2007

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